



AHS INTERNATIONAL

The Vertical Flight Society

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February 25, 2005

Mr. Deepak Joshi
Lead Aerospace Engineer (Structures)
National Safety Transportation Board
490 L'Enfant Plaza, SW
Washington, D.C. 20594

NTSB Notice of Proposed Rulemaking (NPRM 427)

Dear Sir:

We understand that the NTSB proposes to eliminate the ground rotor blade strike exemption from the "Substantial Damage" definition of 47 CFR 830.2.

Our Society opposes deletion of the exemption for the reasons stated in the response of Bell Helicopter Textron. This proposed regulatory change would increase the number of accidents and increase costs to the operator community with no significant safety gain.

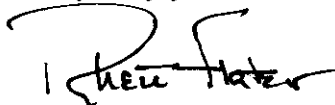
As Bell's response correctly notes, "The proposed change to make ALL rotor blade ground strikes with no other component damage or injury to be now classified as "accidents" would just add to the "No Injury Accidents" group of which the NTSB only goes to the field on 39 of them in 10 years." As you know, the shortage of NTSB field accident investigators is so great that it has been unable to investigate 26.5% of FATAL accidents during the past decade. Overall, NTSB staff have only performed an on-site accident investigation of 17.7% of all U.S. Registered helicopter accidents (under the present definition). Thus, adding ground strikes to the "accident" category would further dilute the NTSB's resources which are needed for more serious accident investigations.

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In our opinion, the proper place to require reporting of ground rotor blade strikes (with no other damage or injury) is as an "incident" under 830.5(a). This would provide the NTSB desired reporting without all of the penalties associated with being called an "accident."

Should you have an interest, AHS International would be happy to convene a meeting of manufacturers and operators to discuss the proposed change and work with the NTSB in working out an appropriate resolution which ensures an appropriate level of safety. Thank you for considering these comments.

Very truly yours,

A handwritten signature in black ink, appearing to read "Rhett Flater", with a stylized flourish above the name.

M.E. Rhett Flater
Executive Director